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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Revision of the Commission's Rules To)
Ensure Compatibility With Enhanced)
911 Emergency Calling Systems)

CC Docket No. 94-102

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COMMENTS OF ALLTEL MOBILE COMMUNICATIONS, INC.

ALLTEL Mobile Communications, Inc. ("ALLTEL Mobile") hereby respectfully submits its comments in the above-captioned rulemaking proceeding with regard to the Commission's proposal¹ to ensure the compatibility between wireless services and enhanced 911 systems ("E911").² ALLTEL Mobile commends the Commission for addressing this important issue as part of its ongoing efforts to promote public safety through the use of wire and radio communications but questions whether the proceeding should be framed as a formal rule-making at this time. Instead of a formal rulemaking, ALLTEL Mobile suggests that the Commission proceed by establishing a broad-based Industry Advisory Board to create an underlying factual record and further the wireless industry's commendable efforts to date to address wireless E911 issues through a deliberate and thorough evaluation of need, expense and technological capabilities. While the issue of wireless provision of E911 services is ripe for initial exploration, the Commission's proposal is premature. Rather than proceeding directly toward the formulation of specific rules,

¹ FCC 94-237 (released October 19, 1994) ("NPRM").

² ALLTEL Mobile is the wholly owned cellular service subsidiary of ALLTEL Corporation, a diversified telecommunications company. The views expressed in these comments are limited to matters respecting the provision of E911 services over wireless facilities.

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the matter at this juncture is better suited to a Notice of Inquiry pursuant to 47 CFR Sec. 1.430. The very nature of the information sought by the Commission in the NPRM and its attempt to delineate time frames for implementation of capabilities which currently are not technically feasible buttress this argument.

The Commission and the wireless industry fully acknowledge the public benefits of continued development of wireless E911 service. No formal assessment of specific needs and uses of wireless E911 services has yet been conducted on a nationwide basis. The Commission has therefore placed itself in the posture of seeking solutions to questions which have yet to be adequately formulated.

The Commission appears to accept on face value the estimate that 10% of 911 calls in many urban areas are from cellular subscribers.³ Again, while this figure may justify the Commission's proceeding with its consideration of the issue, further inquiry as to the nature of these calls must be made in order to fashion appropriate technical solutions. For example, additional study of wireless 911 service is required to determine what percentage of 911 calls occurs as a result of a calling surge when, for example, numerous subscribers on the same highway individually call 911 at the same time to report the same accident. In such situations, call flow control is a key consideration with broad implications for call prioritization and grade of service issues.

³ NPRM at para 9. The Commission, at fn.14 attributes this figure to a Communications Daily article quoting Leah Senitte of the National Emergency Number Association.

Similarly, ALLTEL Mobile suggests that additional study of the E911 needs of roamers must be taken into account. The Commission proposes to require E911 access only in a home service area or a subscribed-to roamed service area.⁴ This rule would have the practical effect of requiring cellular subscribers about to embark on an extended highway trip to identify and register with each system along their route (and pay roaming registration fees) or be potentially foreclosed from using their cellular phone when confronted with an emergency in a cellular service area for which they inadvertently failed to register as a roamer. This is precisely the kind of emergency situation in which the Commission is apparently attempting to promote the use E911 services.⁵ A further delineation of the problem is required before the Commission can properly tailor its rules or mandate compliance deadlines.

Much of the technology required to provide the essential E911 capabilities envisioned by the Commission does not currently exist in wireless systems. For example, wireless networks do not currently have the capability to assign priority to 911 calls. First stage Automatic Location Identification may be possible using existing signaling protocols, but stage two and three would require considerable expense and technological innovation.

Provisions must be made for differences in regional

⁴ NPRM at para. 41.

⁵ ALLTEL Mobile does not require user validation (home or roamer) to access 911 services in any of its markets nor does it bill usage charges on any 911 calls. ALLTEL Mobile fully intends to continue the provision of this service in this fashion.

requirements for 911 service, the technical capabilities of particular mobile services, and the need to phase in wireless E911 services in a manner which would ensure that no carrier is forced to upgrade its system before the area wireline or Public Safety Answering Point ("PSAP") is capable of transmitting or utilizing the data. Appropriate mechanisms must be determined which permit the carriers to justly recover the costs associated with upgrading systems for mandated E911 services.

ALLTEL Mobile, as a carrier, notes that any eventual provision of E911 services necessarily entails close coordination among various wireless service providers, manufacturers, PSAPs and other interested parties, each of which is best suited to address those E911 issues that touch upon its particular expertise. ALLTEL Mobile has little information as to the expenses associated with either the purchase of redesigned equipment or reconfiguration of its network based upon some yet to be proposed standard. Matters such as the cost and technical feasibility of call priority, call back functions, common channel signaling and automatic location identification are all generally best addressed by entities other than the carrier. In the absence of this information, any response to the Commission's inquiry as to the costs and benefits of imposing E911 requirements on wireless carriers would be premature.

Carriers are generally qualified, however, to comment on the potential effects of the Commission's proposal on the cellular services market. As equipment and service prices have continued to go down, cellular systems have enjoyed an increase in new

subscribership thereby permitting the availability of wireless 911 service to an ever increasing population. Should the costs associated with implementing the Commission's E911 proposals markedly increase the cost of cellular equipment and services, new subscribership will dramatically slow and cellular penetration will decrease. Consumers may ultimately refuse to bear the added expense of retrofitting existing units to meet the Commission's new requirements. If any of the public benefits associated with wireless E911 service are premised on cellular's wide availability, then the increased costs associated with the Commission's proposal may produce counter-productive results. Fewer subscribers may be willing to pay the added expense.


The Commission may best pursue E911 service by providing the impetus and the forum for further industry cooperation. Industry, as the Commission acknowledges,⁶ has proceeded to address E911 issues through industry forums, most notably the Joint Experts Meeting through which groups like the Personal Communications Industry Association, the National Emergency Number Association, the Association of Public Safety Communications Officials, the National Association of State 911 Administrators and the Telecommunications Industry Association have continued to expand upon their earlier work on these issues. Rather than mandate capabilities and time frames for implementation at this time, the Commission should

⁶ Indeed, the Commission at Para. 38 indicates that its proposals are largely based upon the "Emergency Access Position Paper" issued July 30, 1994, ("Joint Paper") an effort voluntarily embarked upon by industry.

establish a broad-based Industry Advisory Group (including the Cellular Telecommunications Industry Association) to develop appropriate, achievable, and effective recommendations for ensuring wireless E911 availability prior to embarking upon further attempts to formulate substantive rule requirements. ALLTEL Mobile once again commends the Commission for its efforts to promote the wide availability of enhanced 911 services and looks forward to contributing as the matter continues to be actively considered.

Respectfully submitted,

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January 9, 1995